

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

KINGS DODGE, INC.

Plaintiff,

CHRYSLER GROUP, LLC

Defendant.

Case No. 1:12-cv-445

(Judge Timothy S. Black)

DECLARATION OF JAMES C.  
KEZELE, ESQ.

I, James C. Kezele, Esq., hereby make the following declaration under penalty of perjury:

1. I am of legal age and am competent to testify to the matters herein based on personal knowledge.
2. I am an attorney licensed in the State of Ohio and am an associate at the law firm of Cors & Bassett, LLC.
3. On Thursday and Friday, December 12 and 13, 2013, I travelled to the Ohio Historical Society's Archives Library in Columbus, Ohio and researched the legislative history of Senate Bill 103 ("S.B. 103") in both print and microfilm, which included the 1987 Amendments to Ohio Revised Code Section 4517.52. True and correct copies of this legislative history are attached hereto as Exhibits 1 through 4. Specifically, attached as Exhibit 1 is a copy of the testimony of Richard W. Siehl, a proponent of S.B. 103, to the Ohio Legislature. Attached hereto as Exhibit 2 is a copy of the entire text of S.B. 103. Attached hereto as Exhibit 3 is a copy of all of the legislative history I could locate relating in any way to S.B. 103.



Attached hereto as Exhibit 4 is a copy of the testimony of the Federal Trade Commission to the Ohio Legislature in opposition to S.B. 103.

I hereby declare, under penalty of perjury, that the foregoing statements are true and correct to the best of my knowledge.

Date: 12/12/2013

  
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James C. Kezele, Esq.